

CURTIS J. BUSBY  
Nevada Bar No. 6581  
**BOWMAN AND BROOKE LLP**  
2901 North Central Avenue, Suite 1600  
Phoenix, Arizona 85012  
(602) 643-2300 (Telephone)  
(602) 248-0947 (Facsimile)  
curtis.busby@bowmanandbrooke.com

MARIO D. VALENCIA  
Nevada Bar No. 6154  
**ATTORNEY AT LAW, LLC**  
40 S. Stephanie St., Ste. 201  
Henderson, Nevada 89012  
(702) 384-7494 (Telephone)  
(702) 384-7545 (Facsimile)  
valencia.mario@gmail.com

Attorneys for Defendants Trench France, S.A.S. and Trench Limited

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

NEVADA POWER COMPANY d/b/a NV Energy  
and SIERRA PACIFIC POWER COMPANY  
d/b/a NV Energy,

Plaintiffs,

v.

TRENCH FRANCE, S.A.S. and TRENCH  
LIMITED,

Defendants.

Case No. 2:19-cv-01252 -JAD-VCF

**STIPULATION TO EXTEND  
BRIEFING SCHEDULE RE TRENCH  
FRANCE'S MOTION TO STAY  
DISCOVERY**

On December 13, 2019, defendants Trench Limited and Trench France, S.A.S (collectively, “the Trench defendants”) filed a Motion to Stay Discovery Pending Rulings on Motions to Dismiss (Doc. 29). Plaintiffs’ opposition to that Motion to Stay is currently due on December 27, 2019 and the Trench defendants’ deadline to reply is currently January 3, 2020.

Plaintiffs and the Trench defendants, by and through their respective counsel undersigned, hereby stipulate and respectfully request an order that Plaintiffs shall have up to and including January 6, 2020 to file their Opposition to the Motion to Stay, and the Trench defendants shall have up to and including January 21, 2020 to file their Reply in support of its Motion to Stay Discovery.

1 Given the upcoming holidays and the complexity of the issues involved, all counsel request  
2 additional time to prepare their briefing. This extension is made in good faith and not for purpose of  
3 delay.

4 DATED this 23rd day of December, 2019.

5 **SANTORO WHITMIRE**

**BOWMAN AND BROOKE LLP**

7 By: /s/James E. Whitmire (with permission)

By: /s/Curtis J. Busby

8 Nicholas J. Santoro

Curtis J. Busby

9 Nevada Bar No. 532

Nevada Bar No. 6581

James E. Whitmire

Suite 1600, Phoenix Plaza

Nevada Bar No. 6533

2901 North Central Avenue

10 SANTOR WHITMIRE

Phoenix, Arizona 85012-2736

11 10100 West Charleston Blvd., Ste 250

Las Vegas, Nevada 89135

Mario D. Valencia

Nevada Bar No. 6154

12 Charles R. Messer

**Attorney at Law, LLC**

13 CARLSON & MESSER LLP

40 S. Stephanie St., Ste. 201

5901 W. Century Blvd., Ste. 1200

Henderson, Nevada 89012

14 Los Angeles, California 90045

Attorneys for Defendants Trench France,  
S.A.A. and Trench Limited

15 Attorneys for Plaintiffs

16  
17  
18 IT IS SO ORDERED:

12-26-2019

19 DATED: \_\_\_\_\_

20   
21 \_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE  
22  
23  
24  
25  
26  
27  
28